

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 24-cr-20311-KMM

UNITED STATES OF AMERICA,

Plaintiff,

v.

PEDRO JUAN DOMINGUEZ,

Defendant.

**MOTION FOR DETENTION HEARING
BY DEFENDANT, PEDRO JUAN DOMINGUEZ**

Pursuant to Title 18, United States Code, Section 3142(f), Defendant, PEDRO JUAN DOMINGUEZ, files this motion for a detention hearing and in support thereof, states as follows:

Defendant is charged by Indictment (DE 1) with: (Count 1) Conspiracy to Distribute a Controlled Substance, Intending, Knowing, and Having Reasonable Cause to Believe the Controlled Substance Would be Imported into the United States, in violation of Title 21, United States Code, Sections 959(a) and 963; (Count 2) Conspiracy to Import a Controlled Substance into the United States, in violation of Title 21, United States Code, Sections 952(a) and 963; and (Count 3) Conspiracy to Possess with the Intent to Distribute a Controlled Substance, in

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violation of Title 21, United States Code, Sections 841(a)(1) and 846.

On January 21, 2025, Defendant had his Initial Appearance before the duty Magistrate Judge in this District (DE 7). At that hearing, the government requested that Defendant be detained pending trial (*Id.*). The court scheduled a detention hearing for January 29, 2025. (*Id.*).

However, on January 29, 2025, the court did not conduct a detention hearing because Defendant stipulated to pretrial detention while reserving his right to revisit his detention status at a later date (DE 15). At said hearing, Defendant's arraignment and report re: counsel were continued to February 20, 2025, to give Defendant time to secure a permanent appearance from counsel. (*Id.*).

On February 3, 2025, the undersigned entered a Permanent Appearance on Defendant's behalf (DE 13) and Defendant was arraigned on February 6, 2025. (DE 16, 17).

Defendant now seeks to have a detention hearing to revisit his pretrial detention status.

Undersigned counsel for Defendant has conferred with Assistant United States Attorney Kevin Gerard, who agrees that the Defendant is entitled to a detention hearing, but opposes the Defendant's request for a bond.

Therefore, the parties request that the Defendant's detention hearing be

scheduled on February 20, 2025, at 10:00 A.M.

Scheduling the detention hearing on said date will allow the Defendant to have out-of-state family members present and will allow the government to have the lead case agent present.

WHEREFORE, for the reasons set forth above, Defendant respectfully requests that this Honorable Court grant this Motion for Detention Hearing and schedule said hearing on February 20, 2025, at 10:00. A.M.

DATED: February 13, 2025.

Respectfully submitted,

Donet, McMillan & Trontz, P.A.

By: /s/ David A. Donet, Jr.
David A. Donet, Jr., Esq.
Florida Bar No.: 128910
Attorney for Defendant

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 13, 2025, undersigned counsel electronically filed the foregoing Defendant's Motion For Detention Hearing with the Clerk of the Court using CM/ECF, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

Donet, McMillan & Trontz, P.A.

By: /s/ David A. Donet, Jr.

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